

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation
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Master File No. 1:17-cv-00916-RA

This Document Relates To: All Actions
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**SUPPLEMENTAL DECLARATION OF ISRAEL DAHAN IN FURTHER SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

ISRAEL DAHAN hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm of King & Spalding LLP, attorneys for Defendants Global Brokerage, Inc, (f/k/a FXCM Inc.), Dror Niv, and William Ahdout (collectively, “Defendants”) in the above-captioned action, and a member in good standing of the bar of this Court. I respectfully submit this Supplemental Declaration in Further Support of Defendants’ Motion for Summary Judgment. These additional exhibits are numbered continuously with those filed in support of the Motion and alongside Plaintiffs’ Opposition, found at ECF Nos. 252 and 271, respectively.

2. Attached as Exhibit 208 is an SEC-certified copy of FXCM’s Registration Statement filed on September 3, 2010.

3. Attached as Exhibit 209 is an excerpted copy of the deposition transcript for the deposition of John Dittami, taken by Plaintiffs on January 21, 2021.

4. Attached as Exhibit 210 is an excerpted copy of the deposition transcript for the deposition of Simon Wilson-Taylor, taken by Plaintiffs on June 2, 2021.

5. Attached as Exhibit 211 is an excerpted copy of the deposition transcript for the deposition of Dror Niv, taken by Plaintiffs on February 11, 2021.

6. Attached as Exhibit 212 is an excerpted copy of the deposition transcript for the deposition of Robert Lande, taken by Plaintiffs on January 14, 2021.

7. Attached as Exhibit 213 is a copy of a memorandum from EY regarding “FXCM Inc.’s settlements with US regulators,” dated March 1, 2017, produced by non-party EY at EY-GBI-WP-00004260.

8. Attached as Exhibit 214 is an excerpted copy of the deposition transcript for the deposition of Dror Niv, taken by the Commodity Futures Trading Commission on May 25, 2016.

9. Attached as Exhibit 215 is an excerpted copy of the deposition transcript for the deposition of William Ahdout, taken by Plaintiffs on February 16, 2021.

10. Attached as Exhibit 216 is an excerpted copy of the deposition transcript for the deposition of Joshua Rosenfeld, taken by Plaintiffs on December 9, 2020.

11. Attached as Exhibit 217 is an excerpted copy of the deposition transcript for the deposition of Alex Dick, taken by Plaintiffs on November 18, 2020.

12. Attached as Exhibit 218 is an excerpted copy of the deposition transcript for the deposition of Evan Milazzo in his capacity as a corporate representative for FXCM, taken by Plaintiffs on December 1, 2020.

13. Attached as Exhibit 219 is an excerpted copy of the deposition transcript for the deposition of Evan Milazzo, taken by Plaintiffs on December 2, 2020.

14. Attached as Exhibit 220 is an excerpted copy of the deposition transcript for the deposition of John Dittami, taken by the Commodity Futures Trading Commission on April 7, 2016.

15. Attached as Exhibit 221 is an excerpted copy of the deposition transcript for the deposition of Christopher Meyer, taken by Plaintiffs on December 11, 2020.

16. Attached as Exhibit 222 is an excerpted copy of the deposition transcript for the deposition of Patricia Muchinsky, taken by Plaintiffs on November 20, 2020.

17. Attached as Exhibit 223 is an excerpted copy of the deposition transcript for the deposition of David Stollow in his capacity as a corporate representative for Ernst & Young (“EY”), taken by Plaintiffs on January 25, 2021.

18. Attached as Exhibit 224 is a chart, presented as summary evidence, detailing all invoices and payments between FXCM and Effex. Evidentiary support for the summary evidence is found on the subsequent pages, attached in the order they appear in the chart, and includes documents produced at Bates numbers: GLBR\_00028999; GLBR\_00219651; GLBR\_00188165; GLBR\_00184108; GLBR\_00184115; GLBR\_00184114; GLBR\_00184121; GLBR\_00184135; GLBR\_00184166; GLBR\_00036365; GLBR\_00020633; GLBR\_00219652; GLBR\_00184183; GLBR\_00184185; GLBR\_00184200; GLBR\_00184215; GLBR\_00184217; GLBR\_00184226; GLBR\_00184240; GLBR\_00184247; GLBR\_00184280; GLBR\_00184289; GLBR\_00119096; GLBR\_00184389; GLBR\_00119169; GLBR\_00184400; GLBR\_00119240; GLBR\_00184409; GLBR\_00184420; GLBR\_00184419; GLBR\_00217454; GLBR\_00217436; GLBR\_00217456; GLBR\_00217438; GLBR\_00217440; GLBR\_00217442; GLBR\_00217444; GLBR\_00217446; GLBR\_00217448; GLBR\_00217450; GLBR\_00217451; GLBR\_00217452; GLBR\_00217453; GLBR\_00217455; GLBR\_00217437; GLBR\_00217439; GLBR\_00217441; GLBR\_00217443; GLBR\_00217445; GLBR\_00217447; GLBR\_00217449; EY-GBI-WP-00001808; EY-GBI-WP-00002178; EY-GBI-WP-00002917; EY-GBI-WP-00002918; and EY-GBI-WP-00003155.

19. Attached as Exhibit 225 is a copy of an e-mail exchange with the subject “RE: how are things going with testing,” dated April 8, 2010, produced at Bates numbers GLBR\_00022903-4.

20. Attached as Exhibit 226 is a copy of an e-mail exchange with the subject “RE: PFOF,” dated August 14, 2014, produced at Bates numbers GLBR\_00062622-24.

21. Attached as Exhibit 227 is a copy of an e-mail exchange with the subject “Re: BNP,” dated May 9, 2012, produced at Bates numbers GLBR\_00152459.

22. Attached as Exhibit 228 is an excerpted PDF copy of an excel spreadsheet detailing FXCM’s financial information for the month ending April 30, 2013 produced at Bates number GLBR\_00185254.

23. Attached as Exhibit 229 is an excerpted PDF copy of an excel spreadsheet detailing FXCM’s financial information for the month ending April 30, 2012 produced at Bates number GLBR\_00133264.

24. Attached as Exhibit 230 is a copy of an e-mail exchange with the subject “RE: 9/1/10 Requests,” dated September 2, 2010, produced at Bates numbers GLBR\_00054034-5, with its attachment at GLBR\_00054037.

25. Attached as Exhibit 231 is a copy of an e-mail exchange with the subject “Fw:Wire,” dated December 30, 2010, introduced as exhibit 14 to the deposition of Joshua Rosenfeld, produced at Bates number GLBR\_00184115.

26. Attached as Exhibit 232 are three opinions issued by the Commodity Futures Trading Commission dismissing complaints for reparations filed against FXCM.

27. Attached as Exhibit 233 is the affidavit of Sheldon Abrams, dated December 8, 2015, and produced by non-party Effex Capital at E Capital-000117-18.

Dated: New York, New York  
January 20, 2022

/s/ Israel Dahan

Israel Dahan